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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ANDREW KALLAS,

Plaintiff,

vs.

WHITE HAWKS AUTO LLC, a California limited liability company, TEMPUS LOGIX, INC., a California corporation, NORTHLAND INSURANCE COMPANY, a Connecticut corporation, LUBERNER INTERNATIONAL INSURANCE AGENCY, INC., and DOES 1-15,

Defendants.

Case No. 2:24-cv-02385-CDS-MDC

**STIPULATION AND ORDER TO
EXTEND THE TIME TO FILE A
DISCOVERY SCHEDULING ORDER
(First Request)**

Plaintiff ANDREW KALLAS and defendants WHITE HAWKS AUTO LLC, (“WHITE HAWKS”) NORTHLAND INSURANCE COMPANY (“NORTHLAND”) and LUBERNER INTERNATIONAL INSURANCE AGENCY, INC. stipulate that the parties may have an additional seven days to file their Discovery Scheduling Order which is due on February 4, 2025. The new date will be February 11, 2025.

The reason for the stipulation is that plaintiff, WHITE HAWKS and NORTHLAND are in active settlement discussions. This additional time will allow the parties to finalize these discussions.

1 DATED: February 4, 2025

DATED: February 4, 2025

2 THORNDAL ARMSTRONG, PC

3 /s/ Bradley Paul Elley

4 BRADLEY PAUL ELLEY, ESQ.

5 Nevada Bar No. 658

6 120 Country Club Drive, Suite 5

7 Incline Village, NV 89451

8 Brad@bpelleylaw.com

9 Attorney for Plaintiff

By: /s/ Bruce Scott Dickinson

Bruce Scott Dickinson, Esq.

Nevada Bar No. 2297

Aileen E. Cohen, Esq.

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bsd@thorndal.com

aec@thorndal.com

Attorneys for White Hawks Auto LLC.

10 DATED: February 4, 2025

Dated: February 4, 2025

11 RAY LEGO & ASSOCIATES

12 By: /s/ Timothy F. Hunter

13 Timothy F. Hunter, Esq.

14 Nevada Bar No. 010622

15 7450 Arroyo Crossing Parkway, Suite 250

16 Las Vegas, NV 89113

17 tfhunter@travelers.com

18 Attorney for Northland Insurance

19 Company

/s/ Luz Mejia

Luz Mejia

Luberner International Ins. Agency Inc.

13303 S. Inglewood Ave.

Hawthorne, CA 90250

lmejia@lubemerinsurance.com

DEFENDANT IN PRO PER

20 McMICKLE, KUREY & BRANCH, LLP

21 Scott W. McMickle, Esq.

22 217 Roswell St., Ste. 200

23 Alpharetta, GA 30009

swm@mkblawfirm.com

24 Pro Hac Vice Attorney for Northland

25 Insurance Company

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1 IT IS SO ORDERED: Denied without prejudice Stipulation does not comply with LR IA
2 6-2, which states, in relevant part, that the judge's signature block "must not begin on a
3 separate page; it must appear approximately 1 inch below the last typewritten matter on the
4 right-hand side of the last page of the stipulation or ex parte or unopposed motion...." The
5 parties may submit an amended stipulation in compliance with LR IA 6-2.

6 Dated: 2-6-25

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UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I hereby certify that I am an employee of the office of Bradley Paul Elley, Esq. and that, on this date, a true and correct copy of **STIPULATION AND ORDER TO EXTEND THE TIME TO FILE A DISCOVERY SCHEDULING ORDER (FIRST REQUEST)** was served via the United States District Court CM/ECF system and a copy was sent by electronic notice to the following:

Bruce Scott Dickinson, Esq.
Aileen E. Cohen, Esq.
THORNDAL ARMSTRONG, PC
600 S. Las Vegas Blvd., Suite 400
Las Vegas, NV 89101
email: bsd@thorndal.com
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Attorneys for White Hawks Auto LLC.

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Pro Hac Vice Attorney for Northland Insurance Company

I further certify I caused to be deposited in the United States mail, at Incline Village, Nevada, a true and correct copy of **STIPULATION AND ORDER TO EXTEND THE TIME TO FILE A DISCOVERY SCHEDULING ORDER (FIRST REQUEST)** by placing the same in a sealed envelope upon which First Class postage was fully prepaid, addressed as follows:

Luz Mejia
Luberner International Ins. Agency Inc.
13303 S. Inglewood Ave.
Hawthorne, CA 90250

1 A copy was also sent by email to: lmejia@lubemerinsurance.com

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3 DATED: February 4, 2025.

4 /s/ Elizabeth Lintner
5 ELIZABETH LINTNER
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